

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:21cr42</b>
	)	
<b>KEITH RODNEY MOORE,</b>	)	
<b>Defendant</b>	)	

**DEFENDANT’S CONSENT MOTION TO EXTEND  
REPLY DEADLINE BY ONE BUSINESS DAY**

Keith Moore, through counsel, moves the Court to extend by one business day the reply deadline for his pretrial motions. In support of this motion, Mr. Moore states the following:

1. On May 4, 2021, the government indicted Mr. Moore on one count of possessing a firearm knowing that he was a convicted felon, in violation of 18 U.S.C. § 922(g)(1). *See* ECF No. 3.
2. The Court arraigned Mr. Moore on June 4, 2021. *See* ECF No. 11. On June 7, the Court set a pretrial motions deadline for motions to suppress of fourteen days, a response deadline of fourteen days, and a reply deadline of three days. *See* ECF No. 15. On June 21, 2021, Mr. Moore filed a motion to suppress evidence and statements. *See* ECF No. 17. The government filed its response to that motion on July 6, 2021. *See* ECF No. 22. Thus, Mr. Moore’s reply deadline is today, June 9, 2021.
3. Undersigned counsel was very recently diagnosed with medical conditions that are treatable, but currently making it difficult for her to work at her normal pace for sustained periods of time. Since the government filed its response on June 6, 2021, undersigned counsel has had numerous lengthy meetings with several clients, participated in a

presentence interview, filed another motions and briefs, and had several court appearances.

She thus needs one additional business day to complete the reply in Mr. Moore's case.

4. Undersigned counsel has communicated with the government, represented here by Kevin Elliker, about this request. Mr. Elliker has indicated that the government has no objection to this request.

Thus, Mr. Moore moves the Court to extend by one business day the reply deadline for his pretrial motions.

Respectfully submitted,  
KEVIN RODNEY MOORE

By: /s/

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